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June 25, 2024

**VIA ECF**

Honorable Jennifer L. Rochon  
United States District Court  
Daniel Patrick Moynihan United States Courthouse  
500 Pearl Street  
New York, NY 10007

Re: Cengage Learning, Inc. et al. v. Google LLC, No. 1:24-cv-04274-JLR-BCM

Dear Judge Rochon:

We represent Defendant Google LLC (“Google”) in the above-captioned matter. Plaintiffs Cengage Learning, Inc.; Bedford, Freeman & Worth Publishing Group, LLC d/b/a Macmillan Learning; Macmillan Holdings, LLC; Elsevier Inc.; Elsevier B.V.; and McGraw Hill LLC (collectively “Plaintiffs”) filed the complaint (“Complaint”) in the above-captioned action on June 5, 2024. Dkt. No. 1. Plaintiffs served Google on June 6, 2024. Dkt. No. 13.

Google’s current deadline to move, answer, or otherwise respond to the Complaint is June 27, 2024. If Google moves to dismiss the Complaint, Plaintiffs must file any opposition by July 11, 2024, with Google’s reply due by July 18, 2024.

Google seeks an extension of time to respond to the Complaint; Plaintiffs consent to that extension and also request an extension of time to oppose any motion to dismiss. Subject to the Court’s approval, the parties have agreed on the following briefing schedule:

1. Google shall move, answer, or otherwise respond to the Complaint by August 26, 2024;
2. If Google moves to dismiss the Complaint, Plaintiffs must file any opposition by September 25, 2024; and
3. Google shall file a reply to any opposition made by Plaintiffs by October 9, 2024.

This is the first request for extension of time in this matter. We thank the Court for its consideration of this request.

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Sincerely,


/s/ Allison L. Stillman  
Allison L. Stillman  
of LATHAM & WATKINS LLP

cc: All Counsel of Record (via ECF)

The requests are GRANTED. Defendant shall respond to the Complaint by August 26, 2024. Plaintiffs shall file any opposition to a motion to dismiss by September 25, 2024. Defendant shall reply to any such opposition by October 9, 2024.

**SO ORDERED.**

Dated: June 26, 2024  
New York, New York

  
**JENNIFER L. ROCHON**  
United States District Judge